Dan Bergman M.S., J.D.
NEMCTF Project Coordinator
Mobile Phone (714) 292-5546
Office Phone (949) 646-5276
Facimile (949) 722-9094

361 White Cap Lane,
Newport Coast, CA 92657
P.O. Box 7914,
Newport Beach, Ca 92658
[Email] dbenvlw@aol.com

February 2, 2000

Los Angeles Region
California Regional Water Quality Control Board
320 W. 4th St., Suite 200,
Los Angeles, CA 90013
Attn: Ejigu Soloman
Associate Engineering Geologist

Dear Mr. Soloman:

The Northwest El Monte Community Task Force (NEMCTF) has directed me to submit the proposed monitoring well sampling strategy [Attachment A] within the El Monte Operable Unit in response to the LARWQCB's December, 1999 letters directing each NEMCTF member company to conduct two sampling rounds of their respective facility monitoring wells for the emerging chemicals perchlorate, NDMA, and 1,4-dioxane.

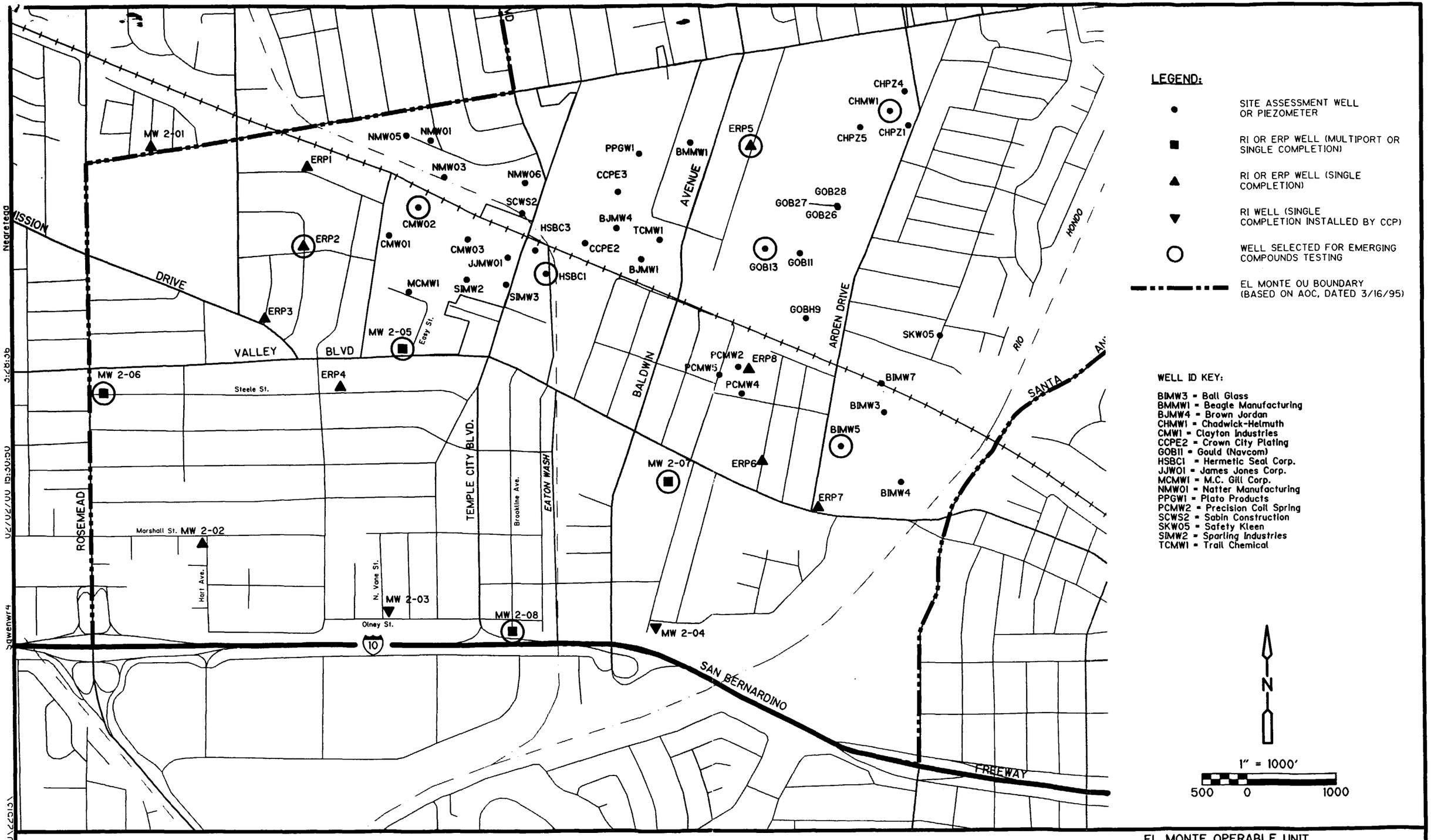
The NEMCTF will authorize CDM to conduct the sampling round as soon as the LARWQCB concurs with the proposed wells in Attachment A. Please let me know the LARWQCB's position as soon as possible

Thank you for your cooperation in this matter and your continuing assistance with the NEMCTF's efforts to conduct early start remedial activities.

Sincerely,

Dan Bergman,
NEMCTF Project Coordinator

Cc: NEMCTF Member Companies; CDM
U.S. EPA, Ms. Bella Dizon



EL MONTE OPERABLE UNIT

WELLS SELECTED FOR EMERGING COMPOUNDS TESTING

Figure 1

CDM
environmental engineers, scientists, planners, & management consultants

Attachment A

On behalf of the Northwest El Monte Community Task Force (NEMCTF), Camp Dresser & McKee Inc. (CDM) has evaluated recent (September 1999) and historical groundwater sampling results for El Monte Operable Unit (EMOU) Network and Early Response Action Program (ERAP) wells. The evaluation was performed in response to the Los Angeles Regional Water Quality Control Board 's request to sample all site assessment wells for the following "emerging compounds": perchlorate; 1,4-dioxane; and NDMA (N-nitroso-dimethylamine).

During the EMOU Interim Remedial Investigation (RI), selected site assessment wells and wells installed by the Task Force during the RI were designated as "Network" wells and were sampled during four quarterly events in 1996/1997 (Rounds 1 through 4). At EPA's request and as approved by the Task Force, Network and Phase 1a ERAP wells were resampled during September 1999 (Round 5). It should also be noted that EPA requested additional analysis for MTBE (methyl-tertiary-butyl-ether) and perchlorate during Round 3 (August 1997). The Task Force sampled four wells/sampling ports for perchlorate testing (site assessment wells CHMW1 and GOB13, and multiport wells MW2-074 [Port 4] and MW2-072 [Port 2]) and nine wells/sampling ports for MTBE testing (site assessment wells CHMW1, CMW1, GOB13, NMW5, and SIMW3, and multiport wells MW2-054 [Port 4], MW2-052 [Port 2], MW2-075 [Port 5], and MW2-072 [Port 2]. Perchlorate and MTBE were not detected in any of the sampled wells.

Based on evaluation of the groundwater sampling results for Rounds 1 through 5, the following wells/sampling ports are proposed for emerging compounds testing:

Facility Wells (single completion) – BIMW5, CMW2, CHMW1, GOB13, and HSBC1

ERAP Wells (single completion) – ERP2 and ERP5

RI Wells (multiport) – MW2-054 (Port 4, screened 110 – 120 feet bgs)

MW2-051 (Port 1, screened 374 - 384 feet bgs)

MW2-061 (Port 1, screened 364 – 374 feet bgs)

MW2-075 (Port 5, screened 54 – 64 feet bgs)

MW2-074 (Port 4, screened 105 – 115 feet bgs)

MW2-072 (Port 2, screened 280 – 290 feet bgs)

MW2-081 (Port 1, screened 388 – 398 feet bgs)

Therefore, a total of 14 samples plus one duplicate will be collected from the wells/sampling ports. Clearly, the array of wells which have been proposed for sampling is considerably more extensive than previously sampled for MTBE and perchlorate. Although no perchlorate was detected in the prior EMOU sampling, and there are no known or suspected sources of either perchlorate or NDMA in the EMOU, this broader array of wells is intended

as a final confirmation of the absence of these compounds in the EMOU. Furthermore, the breadth of the array is intended to provide full geographic and depth coverage to identify the presence, if any, of 1,4-dioxane.

The locations were selected based on an evaluation of historical and recent groundwater sampling results and direction of groundwater flow within the EMOU. Generally, the direction of flow in the shallow and deep zones is towards the west. In the eastern portion of the EMOU, a southwesterly component has been observed. In the northwestern portion of the EMOU, a northwestern component has also been observed. The specific rationale for each proposed sampling location is provided below:

CHMW1, GOB13, BIMW5 – these locations allow for an evaluation of the presence of emerging compounds in the shallow zone in the eastern portion of the EMOU. The distribution of the three wells provides good spatial coverage from north to south.

ERP5 – analytical results for samples collected from this location during January and September 1999 indicated elevated TCE concentrations (610 and 920 micrograms per liter [µg/L]). The compound 1,4-dioxane may be associated with elevated TCE, therefore, this location was included in the proposed shallow zone sampling in the eastern portion of the EMOU.

MW2-07 (Ports 5, 4 and 2) – this location was selected because it is located within the deep VOC plume in the southeast portion of the EMOU, and will allow for an evaluation of the presence of emerging compounds with increased depth. Ports 5 and 4 characterize the shallow zone to approximately 115 feet below ground surface (bgs), with Port 2 characterizing the deeper zone. Port 2 was selected to characterize the deep zone because PCE and TCE concentrations for samples collected from Port 2 were elevated in comparison to the concentrations reported for samples collected from Port 1.

HSBC1 – this location was selected because of it's location in the approximate center of the EMOU, historical elevated VOC concentrations, and interest in characterizing a location where groundwater remediation is ongoing.

CMW2 – this location was selected in order to evaluate the presence of emerging compounds in the shallow zone in the northwest portion of the EMOU, in an area where elevated TCE has historically been detected.

ERP2 – this location was selected in order to evaluate the presence of emerging compounds at a location proposed for groundwater extraction. During well development, a higher pumping rate was achieved with less drawdown (indicating higher hydraulic conductivity) in comparison to wells ERP1 and ERP3. These factors favored the selection of this well vs. the other two wells.

MW2-05 (Ports 4 and 1) – this well was selected in order to allow for an evaluation of the presence of emerging compounds in the shallow and deep zones in the central western portion of the EMOU.

MW2-06 (Port 1) and MW2-08 (Port1) – these locations were selected in order to evaluate the presence of emerging compounds in the deep zone in the extreme western and southern

portions of the EMOU. VOC concentrations in the shallow zone at these locations have been relatively minor, therefore, shallow port sampling is not recommended.

The proposed sampling locations include six shallow wells (BIMW5, CHMW1, GOB13, ERP5, MW2-075 and MW2-074) and one deep well (MW2-072) in the eastern half of the EMOU; and four shallow wells (CMW2, HSBC1, MW2-054, and ERP2) and three deep wells (MW2-051, MW-061, and MW-081) in the western half of the EMOU. Should 1,4-dioxane (or other emerging compounds) be detected in any of these wells, a second round of sampling will be performed; the scope of such additional sampling, if required, would be developed in concert with the LARWQCB and USEPA, based on the results of the first round of sampling.